

June 12, 2000

Mr. Pete Avenatti
Ulrich Chemical
1400 Lockport Road
Terre Haute, IN 47802

Re: 167-12164-00052
First Minor Revision to
FESOP 167-5668-00052

Dear Mr. Avenatti:

Ulrich Chemical was issued a permit on December 13, 1996 for a chemical processing and distribution operation. A letter requesting changes to this permit was received on April 11, 2000. Pursuant to the provisions of 326 IAC 2-8-11.1 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the VOC and HAP limits from a 365-day period to a twelve (12) consecutive month period and in the corresponding reporting requirements.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Rob Harmon, VCAPC, 103 South 3rd Street, Terre Haute, Indiana 47807, or call at (812) 462-3433, and ask for Rob Harmon or extension 14.

Sincerely,

George M. Needham
Director
Vigo County Air Pollution Control

Attachments

RKH

cc: U.S. EPA, Region V
Illinois EPA
IDEM-OAM - Compliance Data Section - Karen Nowak
IDEM-OAM - Technical Support and Modeling - Michele Boner
IDEM-OAM - Contract Management - Mindy Hahn
IDEM-OAM - Winter Bottum

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT
and
VIGO COUNTY AIR POLLUTION CONTROL**

**Ulrich Chemical, Inc.
1400 Lockport Road
Terre Haute, Indiana 47802**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F167-5668-00052	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: December 13, 1996

First Administrative Amendment No.: 167-8216-00052, issued on March 24, 1997

Second Administrative Amendment No.: 167-8663-00052, issued on June 24, 1997

Third Administrative Amendment No.: 167-9448-00052, issued on February 12, 1998

First Minor Permit Revision No.: F167-5668-00052 Pages Affected: 16, 21, 22, 23, 27, 28, and 29	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date:

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Overall Source Limit (326 IAC 2-8)

Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed a total of 99 tons per 12 consecutive month period, rolled monthly. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed a total of 9 tons per 12 consecutive month period, rolled monthly for any individual HAP or a total of 24 tons per 12 consecutive month period, rolled monthly of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

C.2 Opacity

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in Section D:

- (a) Visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings,
- (b) Visible emissions shall not exceed 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 Open Burning

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

C.4 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated..

C.5 Fugitive Particulate Matter Emission Limitations

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on April 3, 1996.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that potentially might emit pollutants into the ambient air specified within this FESOP shall be properly operated and maintained.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- (c) The permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) Three (3) material handling operations: (1) Transfer of material from screw auger to bucket lift, identified as MH1, maximum throughput of 52,000 tons per year, with fugitive emissions. (2) Transfer of material from rail car to bag, identified as MH2, maximum throughput of 54,750 tons per year, with fugitive emissions. (3) Bagging operations, identified as MH3, maximum throughput of 52,000 tons per year, with a baghouse for particulate control, identified as MH.
- (b) One (1) paint booth, identified as PB. The paint booth is equipped with an air atomization spray gun for metal chemical containers, at a maximum capacity of 1.53 gallons per hour. One (1) enclosed area, identified as PA. This area is used when spraying aerosol cans for metal chemical containers, at a maximum capacity of 0.305 gallons per hour.
- (c) One (1) shot blasting system, identified as Blast 1, with a blasting capacity of maximum capacity of 3.75 pounds per hour, with an inherent to system design for particulate control.
- (d) Three (3) 12,000 gallon storage tanks (T2, T3, and T4) for Sodium Hydroxide.
- (e) One (1) 20,000 gallon storage tank (T5) for Sodium Hydroxide.
- (f) One (1) 22,000 gallon storage tank (T6) for Sodium Hydroxide.
- (g) Two (2) 5,500 gallon storage tanks (T7 and T8) for a bleach generation.
- (h) One (1) 5,500 gallon storage tank (T9) for a finished bleach.
- (i) One (1) 10,000 gallon storage tank (T10) for bleach.
- (j) One (1) 10,000 gallon storage tank (T11) for bleach.
- (k) One (1) 8,200 gallon storage tank (T12) for Muratic Acid.
- (l) One (1) 6,000 gallon storage tank (T13) for Sulfuric Acid.
- (m) One (1) 7,000 gallon storage tank (T14) for Aqua Ammonia.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM)

That pursuant to 326 IAC 6-3-2, particulate matter emissions shall be limited as follows:

- (a) The material handling facility shall not exceed 13.5 pounds per hour (lb/hr) for the material transfer from the screw auger to the bucket lift.
- (b) The material handling facility shall not exceed 14.0 pounds per hour (lb/hr) for the material transfer from the rail car to bags.
- (c) The material handling facility shall not exceed 13.5 pounds per hour (lb/hr) for the material transfer from the bagging operation.
- (d) The material handling facility shall not exceed 0.061 pounds per hour (lb/hr) for the mechanical blasting operation.
- (e) The particulate matter (PM) emissions from the material handling facility shall not exceed a total of 95 tons per 12 consecutive month period, rolled monthly (the total source is limited to a total of 99 tons per 12 consecutive month period, rolled monthly and the surface coating operation PM emissions are 3.73 tons per 12 consecutive month period, rolled monthly). In order to assure compliance with this limit, the particulate matter control equipment shall be in operation at all times when the material handling facility is in operation.

D.1.2 Volatile Organic Compound

- (a) That pursuant to 326 IAC 8-2-9(d)(2) (Miscellaneous Metal Coating Operations), and OP-52-7399-01-93, issued by VCAPC, the volatile organic compound (VOC) content of coating applied to the metal chemical containers shall be limited to 3.5 pounds of VOC per gallon of coating less water, for forced air dried coatings for the paint booth operation and Ulrich Blue Water Base Enamel.
- (b) That pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (c) That the volatile organic compound (VOC) emissions from the paint booth (PB) and paint area (PA) shall not exceed a total of 99 tons per 12 consecutive month period, rolled monthly. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Volatile Organic Compound (VOC) Usage

That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (b) The VOC content (weight percent) of each material used;
- (c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.

D.1.4 Hazardous Air Pollutants

That the hazardous air pollutant emissions shall be limited as follows:

- (a) A single hazardous air pollutant (HAP) emissions shall not exceed a total of 9 tons per 12 consecutive month period, rolled monthly.
- (b) Any combination of HAPs emissions shall not exceed a total of 24 tons per 12 consecutive month period, rolled monthly.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.5 Particulate Matter Overspray

That pursuant to OP-52-7399-01-93, issued by VCAPC, the dry filters for particulate matter overspray control shall be in operation at all times when the paint booth (PB) is in operation. The facility shall comply with 326 IAC 6-3-2(c). The equation for 326 IAC 6-3-2(c) is as follows:

$$E = 4.10P^{0.67} \quad \text{where } E = \text{emission rate in pounds per hour} \\ P = \text{process weight rate in tons per hour}$$

D.1.6 Monitoring

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To document compliance with Condition D.1.5 observations shall be made daily of the overspray while one or more of the booths is in operation.

Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.7 Hazardous Air Pollutant (HAP)

That the Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

- (a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (b) The HAP content (**weight percent**) of each material used;
- (c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and
- (d) Identification of the facility or facilities associated with the usage of each HAP.

**Indiana Department of Environmental Management
Office of Air Management
and
Vigo County Air Pollution Control**

Technical Support Document (TSD) for a for a Permit Revision to a
Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Ulrich Chemical
Source Location:	1400 Lockport Road, Terre Haute, Indiana 47802
County:	Vigo County
SIC Code:	5169
Operation Permit No.:	F 167-5668-00052
Operation Permit Issuance Date:	December 13, 1996
Permit Revision No.:	F 167-12164-00052
Permit Reviewer:	Rob Harmon

Vigo County Air Pollution Control (VCAPC) has reviewed a revision application from Ulrich Chemical relating to the operation of chemical processing and distribution operations.

History

On April 11, 2000, Ulrich Chemical submitted an application to VCAPC requesting a change in the amount of data to be included in their quarterly reports. Currently they are required to include daily information and they requested that be reduced to monthly information. In order to allow this change the emission limitations are changing from 365 day rolling totals to 12 month rolling totals. Ulrich Chemical was issued a FESOP on December 13, 1996.

Justification for Modification

The FESOP Operating permit is being modified through a FESOP Minor Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(d)(1) which requires a minor permit revision for modifications that reduce the frequency of any monitoring or reporting required by a permit condition.

The specific revisions included in this permit revision are detailed below utilizing **redline** for additional language and ~~strikeout~~ for deleted language:

Condition C.1 is modified as follows:

- C.1 Overall Source Limit (326 IAC 2-8)
Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed **a total of 99 tons per 365-day period 12 consecutive month period, rolled monthly**. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed **a total of 9 tons per 365-day period 12 consecutive month period, rolled monthly** for any individual HAP or **a total of 24 tons per 365-day period 12 consecutive month period, rolled monthly** of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

Condition D.1.1(e) is modified as follows:

- (e) The particulate matter (PM) emissions from the material handling facility shall not exceed **a total of 95 tons per year 12 consecutive month period, rolled monthly** (the total source is limited to **a total of 99 tons per year 12 consecutive month period, rolled monthly** and the surface coating operation PM emissions are 3.73 tons per **year 12 consecutive month period, rolled monthly**). In order to assure compliance with this limit, the particulate matter control equipment shall be in operation at all times when the material handling facility is in operation.

Condition D.1.2(c) is modified as follows:

- (c) That the volatile organic compound (VOC) emissions from the paint booth (PB) and paint area (PA) shall not exceed **a total of 99 tons per year 12 consecutive month period, rolled monthly**. Therefore, the requirements of 326 IAC 2-7 do not apply.

Condition D.1.4 is modified as follows:

D.1.4 Hazardous Air Pollutants

That the hazardous air pollutant emissions shall be limited as follows:

- (a) A single hazardous air pollutant (HAP) emissions shall not exceed **a total of 9 tons and year per 12 consecutive month period, rolled monthly**.
- (b) Any combination of HAPs emissions shall not exceed **a total of 24 tons per year 12 consecutive month period, rolled monthly**.

Therefore, the requirements of 326 IAC 2-7 do not apply.

Condition D.1.10 is added as follows:

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(c) and D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The reporting forms are also modified to reflect the changed limitations.

Existing Approvals

The source was issued a FESOP (F167-5668-00052) on December 13, 1996. The source has since received the following:

- (a) First Administrative Amendment No.: 167-8216-00052, issued on March 24, 1997;
- (b) Second Administrative Amendment No.: 167-8663-00052, issued on June 24, 1997; and
- (c) Third Administrative Amendment No.: 167-9448-00052, issued on February 12, 1998.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 11, 2000.

Emission Calculations

This application only affects the frequency of data presented in quarterly emission reports and how that data is compiled. It does not affect either potential or actual emissions. Therefore, there are no calculations to present.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries.

There would not be any change in the potential or actual emissions of Hazardous Air Pollutants (HAPs) as a result of this approval.

Conclusion

The operation of this chemical processing and distribution operation shall be subject to the conditions of the attached Minor Permit Revision No. 167-12164-00052.